

EXHIBIT 36

Excerpts from the Deposition of Scott Coker

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)	
FITCH, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:15-cv-01045-RFB- (PAL)
)	
ZUFFA, LLC, d/b/a Ultimate)	
Fighting Championship and)	
UFC,)	
)	
Defendant.)	
_____)	

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF

SCOTT COKER

LOS ANGELES, CALIFORNIA

AUGUST 3, 2017

9:09 a.m.

REPORTED BY:
CYNTHIA K. DuRIVAGE, CSR #451
JOB NO. 51251

<p style="text-align: right;">162</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 preacquisition, did that cease once UFC had completed</p> <p>3 the acquisition of Strikeforce?</p> <p>4 MS. GRIGSBY: Objection to form.</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MR. DELL'ANGELO:</p> <p>7 Q. So for example, after the UFC acquired</p> <p>8 Strikeforce, Mr. White stopped calling Strikeforce</p> <p>9 Strikeforce?</p> <p>10 A. Yes, that's correct.</p> <p>11 Q. Okay. And after the UFC acquired</p> <p>12 Strikeforce, to the best of your knowledge, did</p> <p>13 Mr. White stop making personal attacks with respect</p> <p>14 to you?</p> <p>15 A. To my knowledge.</p> <p>16 Q. I apologize if I asked this before. I just</p> <p>17 wanted to be clear about this point.</p> <p>18 Were you involved in the decision to cease</p> <p>19 operations of Strikeforce after the acquisition by</p> <p>20 UFC?</p> <p>21 A. No.</p> <p>22 Q. Did anyone at the UFC discuss with you some</p> <p>23 of the changes that you've testified about after the</p> <p>24 UFC's acquisition of Strikeforce, such as with</p> <p>25 respect to fighters and sponsorship tax, those sorts</p>	<p style="text-align: right;">164</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 March of 2014?</p> <p>3 MR. KELLY: Objection, vague and ambiguous.</p> <p>4 MR. DELL'ANGELO: Fair. I'll withdraw the</p> <p>5 question.</p> <p>6 BY MR. DELL'ANGELO:</p> <p>7 Q. After March of 2014, were you employed?</p> <p>8 A. No.</p> <p>9 Q. Did you become involved in any other MMA</p> <p>10 promotion?</p> <p>11 A. In June of '14, I did.</p> <p>12 Q. And in June of 2014, what MMA promotion did</p> <p>13 you become involved in?</p> <p>14 A. Bellator MMA.</p> <p>15 Q. And I think you mentioned a little earlier</p> <p>16 that your agreement with the UFC after the</p> <p>17 acquisition of Strikeforce was essentially a</p> <p>18 noncompete; is that right?</p> <p>19 A. It was an employment agreement, but as we</p> <p>20 were negotiating the deal with my partners, they</p> <p>21 approached me, and they said look, you know, UFC is</p> <p>22 not going to just let you open up another company in</p> <p>23 two months.</p> <p>24 Q. Sure.</p> <p>25 A. So there's going to be an employment</p>
<p style="text-align: right;">163</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 of things?</p> <p>3 A. Can you repeat that one more time.</p> <p>4 Q. Sure. So I think you testified a little</p> <p>5 earlier that there were some changes at Strikeforce</p> <p>6 after it was acquired by the UFC, some of those</p> <p>7 things including like moving fighters from</p> <p>8 Strikeforce to the UFC and imposition of the</p> <p>9 sponsorship tax to Strikeforce fighters.</p> <p>10 Did anybody at the UFC talk to you about</p> <p>11 those decisions?</p> <p>12 A. No. My role, really, was almost like an</p> <p>13 on-call consultant, and I had no decision-making</p> <p>14 ability at my time at the UFC.</p> <p>15 Q. All right. Did there come a time -- did</p> <p>16 there come a time when you ceased to be involved with</p> <p>17 Strikeforce and the UFC altogether?</p> <p>18 A. Yes.</p> <p>19 Q. When was that?</p> <p>20 A. March of '14.</p> <p>21 Q. Okay. And why in March of '14 did you come</p> <p>22 to no longer be involved with Strikeforce or the UFC?</p> <p>23 A. That is when my three-year deal with the</p> <p>24 UFC ran out.</p> <p>25 Q. And what, if anything, did you do after</p>	<p style="text-align: right;">165</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 agreement, to me, which I interpret that as a</p> <p>3 noncompete agreement. And I think there was some</p> <p>4 noncompete language in there, I can't remember.</p> <p>5 But essentially, that's what the deal was</p> <p>6 was that, you know, in order for the sale to go</p> <p>7 through, I basically had to agree to this three-year</p> <p>8 deal.</p> <p>9 Q. And you interpreted the three-year deal as</p> <p>10 part of the sale of Strikeforce to the UFC as, at</p> <p>11 least in part, effectively a noncompete?</p> <p>12 A. That's correct.</p> <p>13 Q. That is, in the MMA industry?</p> <p>14 A. Yes.</p> <p>15 Q. So by March of 2014, that agreement had</p> <p>16 expired, and as of June of 2014, you became involved</p> <p>17 in Bellator, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And tell me about -- tell me about</p> <p>20 that. How did you become involved in Bellator?</p> <p>21 A. Had a meeting with Kevin Kay, and I was</p> <p>22 actually on my path to start another organization.</p> <p>23 And after meeting Kevin, I felt very comfortable in</p> <p>24 jumping on the Bellator ship and try to get them, you</p> <p>25 know, situated properly and make this a real</p>

<p style="text-align: right;">166</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 legitimate MMA company.</p> <p>3 Q. And prior to your involvement in Bellator</p> <p>4 in June of 2014, how would you characterize it as an</p> <p>5 MMA promoter?</p> <p>6 A. How would I characterize?</p> <p>7 Q. Bellator --</p> <p>8 A. Bellator.</p> <p>9 Q. -- as an MMA promoter before you got</p> <p>10 involved in June of 2014.</p> <p>11 A. Bellator was run by Bjorn Rebney, and at</p> <p>12 that time, I felt like it was a dying brand.</p> <p>13 Q. Why did you view Bellator as a dying brand</p> <p>14 before you got involved in June of 2014?</p> <p>15 A. I don't think it -- to me, the way I felt</p> <p>16 was it didn't have the respectability and the</p> <p>17 credibility of the MMA community, the managers, the</p> <p>18 fighters, and lacked star power.</p> <p>19 Q. And what do you mean it lacked star power?</p> <p>20 A. They didn't have very big names at</p> <p>21 Bellator.</p> <p>22 Q. Just so we're clear, I'm going to ask you a</p> <p>23 series of questions that are all pre of June '14.</p> <p>24 I'll try to preface them, make it clear if I'm asking</p> <p>25 something different, so I don't have to keep</p>	<p style="text-align: right;">168</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 you have an opportunity to develop an understanding</p> <p>3 of its financial condition?</p> <p>4 A. I'm not sure.</p> <p>5 Q. So you've been involved in the mixed</p> <p>6 martial arts industry since at least 2006, right?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And from 2006 to June of 2014 when</p> <p>9 you became involved in Bellator, do you know during</p> <p>10 what period of time within that time frame Bellator</p> <p>11 existed?</p> <p>12 A. Bellator started as a product that was</p> <p>13 created by the founder, Bjorn Rebney, I think they</p> <p>14 started in '06 or '07, and I can't be sure, it might</p> <p>15 have been later than that. They were not backed by</p> <p>16 Viacom at that time, and they were ESPN Deportes</p> <p>17 product, which was made for Spanish television.</p> <p>18 That's why they called it Bellator because in Latin,</p> <p>19 it means warrior.</p> <p>20 Q. So you were involved in the MMA industry</p> <p>21 for basically the whole time that Bellator was in</p> <p>22 business, right?</p> <p>23 A. Well, yes, but I mean, I would say that</p> <p>24 there's probably two years or a year-and-a-half that</p> <p>25 I basically unplugged and wasn't really actively on</p>
<p style="text-align: right;">167</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 repeating it and we understand each other.</p> <p>3 Before you got involved with Bellator in</p> <p>4 June of 2014 -- well, did you have an understanding</p> <p>5 as to why Bellator lacked, as you've used the term,</p> <p>6 star power before June of 2014?</p> <p>7 MS. GRIGSBY: Objection, foundation.</p> <p>8 THE WITNESS: My belief is that the founder</p> <p>9 and the promoter, Bjorn Rebney at that time, quite</p> <p>10 frankly, a lot of people didn't like him and didn't</p> <p>11 want to do business with him.</p> <p>12 So that makes it tough when you're trying</p> <p>13 to recruit fighters.</p> <p>14 BY MR. DELL'ANGELO:</p> <p>15 Q. Are there any other reasons that you can</p> <p>16 think of?</p> <p>17 A. You're talking specifically about 2014.</p> <p>18 Q. Before June of 2014 why Bellator didn't</p> <p>19 have big names or star power?</p> <p>20 MS. GRIGSBY: Objection, foundation.</p> <p>21 THE WITNESS: I think it comes to</p> <p>22 leadership, and I think that there was lacking --</p> <p>23 there was a lack of leadership.</p> <p>24 BY MR. DELL'ANGELO:</p> <p>25 Q. So when you joined Bellator in 2014, did</p>	<p style="text-align: right;">169</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 the websites or talking to people and really more</p> <p>3 focused on things that I wanted to do.</p> <p>4 Q. What period of time was that?</p> <p>5 A. That was from the time that Strikeforce</p> <p>6 closed until, let's say, March of '14.</p> <p>7 Q. So Strikeforce closed in March of '11,</p> <p>8 right? I think that's what you testified to.</p> <p>9 A. No. It was bought in March of '11, then it</p> <p>10 ran for a year-and-a-half.</p> <p>11 Q. I'm sorry. When you say closed, I was</p> <p>12 thinking the transaction closed. You mean the</p> <p>13 business closed?</p> <p>14 A. The business closed, yeah.</p> <p>15 So the last year-and-a-half, really, if I</p> <p>16 wanted to go to a fight, a UFC, I would call and they</p> <p>17 would arrange tickets. Other than that, I was doing</p> <p>18 a lot of personal things.</p> <p>19 Q. Okay. So from the time Bellator closed --</p> <p>20 excuse me. Withdraw that.</p> <p>21 From the time that Strikeforce closed in</p> <p>22 2013 to roughly March of 2014, you were not a student</p> <p>23 of the MMA industry; is that right?</p> <p>24 A. I was studying martial arts myself. I was</p> <p>25 traveling with my girlfriend and playing a lot of</p>

<p style="text-align: right;">170</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 golf.</p> <p>3 Q. You weren't a student of the MMA promotion</p> <p>4 industry or business, right?</p> <p>5 A. No.</p> <p>6 Q. So about three months later, you become</p> <p>7 involved in Bellator, correct? So June of 2014,</p> <p>8 about three months after you kind of emerged from</p> <p>9 your --</p> <p>10 A. Yes.</p> <p>11 Q. -- your hiatus, if you will? Okay.</p> <p>12 And so, from the time of March 2014 to the</p> <p>13 time of June 2014, did you study or research Bellator</p> <p>14 to try to understand it more and why it may have</p> <p>15 lacked star power?</p> <p>16 A. No. The mindset really wasn't to, you</p> <p>17 know, like to study anything, really. It was stop</p> <p>18 and smell the roses, unwind a little bit, just relax.</p> <p>19 Go on vacation, travel, you know, travel all over the</p> <p>20 world for a year-and-a-half, and then, play a lot of</p> <p>21 golf and just relax.</p> <p>22 Q. Right. Yes, I appreciate that. All I was</p> <p>23 really trying to understand is up to June of 2014 how</p> <p>24 dialoed in you really were to Bellator's business and</p> <p>25 why, you know --</p>	<p style="text-align: right;">172</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 tilting? I go: I don't know. I go -- I had to</p> <p>3 think about that.</p> <p>4 And I said something to him, and I wanted</p> <p>5 to see how he'd react. And what I said was, I said:</p> <p>6 Kevin, you don't only have a black eye in the</p> <p>7 business, you have an orbital fracture, and I'm not a</p> <p>8 surgeon. I don't even know if I can help you.</p> <p>9 He said: Well, hey, think about it. I</p> <p>10 said: Well, I'll think about it.</p> <p>11 And I didn't call him back for a month</p> <p>12 because I wasn't looking for a job, I didn't want to</p> <p>13 be employed by anybody.</p> <p>14 But he kept calling me and talking. And</p> <p>15 the more I talked to him, I started feeling good</p> <p>16 about his vision.</p> <p>17 And so, finally, after much -- you know,</p> <p>18 thinking about it for two-and-a-half months, I said:</p> <p>19 You know what, F it. Let's go for it. I'm going to</p> <p>20 go and try my best and try to help build Bellator.</p> <p>21 And then, they made the move to remove Bjorn, and I</p> <p>22 came in two days later. And that was March of '14,</p> <p>23 yeah, March of '14.</p> <p>24 Q. In your estimation, as you just sort of</p> <p>25 articulated, was Bellator's lack of star power part</p>
<p style="text-align: right;">171</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 A. I had no idea. Honestly, it was Kevin Kay</p> <p>3 requesting a meeting, and I didn't even know who</p> <p>4 Kevin Kay was, to be honest with you. So I said,</p> <p>5 okay, I'll go meet him. But really, I'm going to go</p> <p>6 open another company. I remember telling some</p> <p>7 friends: I'm not in the business of building other</p> <p>8 people's businesses, I'm go to build my own business</p> <p>9 again and I'm going to go back and do this.</p> <p>10 And I sat down with Kevin Kay, and he's</p> <p>11 telling me what he's doing, telling me what he wants</p> <p>12 to do, wants to make a move in the top position.</p> <p>13 Originally, I thought he wanted me to work</p> <p>14 with Bjorn Rebney. I said, well, this is not -- you</p> <p>15 know, by committee, this is -- something that has to</p> <p>16 be very, you know -- somebody has to make the</p> <p>17 decision. I don't want to argue with somebody else.</p> <p>18 And I said, Kevin, I go, your brand has</p> <p>19 really been dented. And you know, I'm coming up off</p> <p>20 a very, very -- you know, time in my life where</p> <p>21 Strikeforce was great, I want to create something</p> <p>22 else great.</p> <p>23 I remember telling Kevin this. I said,</p> <p>24 your ship is kind of like the Titanic. You know? Do</p> <p>25 I want to jump on the Titanic as you guys are</p>	<p style="text-align: right;">173</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 of what made it like the Titanic in the MMA industry?</p> <p>3 A. I think it comes from leadership at the</p> <p>4 top, and it was that tournament format. To me, the</p> <p>5 tournament format, my belief is this -- and I worked</p> <p>6 for K-1 for eight years, which was the greatest</p> <p>7 tournament format, you know, entity ever, that and</p> <p>8 Pride.</p> <p>9 And you should do tournaments when you have</p> <p>10 eight stars because then, everybody can identify with</p> <p>11 these eight fighters, just like we did for the</p> <p>12 heavyweight tournament.</p> <p>13 These were tournament formats that were</p> <p>14 happening every week in a different city in a little</p> <p>15 town that, you know, a lot of people didn't hear</p> <p>16 about. You know, I didn't even know what some of</p> <p>17 these cities were. And a 1500, 1800-seat stadium.</p> <p>18 It just looked very small, very dark, very dingy, and</p> <p>19 the product was just subpar. And this is before, you</p> <p>20 know, Viacom came in and took it over.</p> <p>21 So that's what I was referring to. Kevin</p> <p>22 was like, you know. And he goes: Well, have you</p> <p>23 watched our product lately? I says: No, not really.</p> <p>24 And I really hadn't even watched one episode to that</p> <p>25 point. He goes: Well, check it out.</p>

<p style="text-align: right;">174</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 And I said: You know, Kevin, the</p> <p>3 tournament format doesn't work. I'm telling you,</p> <p>4 you've got to have eight stars. And then, your</p> <p>5 overlapping of tournaments were -- you know, because</p> <p>6 this is what I was hearing from the managers and the</p> <p>7 fighters and even some of my friends that are hard</p> <p>8 core MMA fans can't keep up with which tournament is</p> <p>9 fighting today and which one is next week and who,</p> <p>10 what weight class. They just get confused because</p> <p>11 there's so many tournaments going on at the same</p> <p>12 time.</p> <p>13 Q. Right.</p> <p>14 A. So I told Kevin, I said: We have to change</p> <p>15 the format. We have to go back to star fights, you</p> <p>16 know, star versus star, and we have to --</p> <p>17 MR. KELLY: Slow down a little bit.</p> <p>18 THE WITNESS: I'm getting excited, you</p> <p>19 know.</p> <p>20 But I just told Kevin that we have to</p> <p>21 change the format, and he was agreeable. He said:</p> <p>22 Look, if we give you the reigns, we're going to give</p> <p>23 you the reigns, and you go do it.</p> <p>24 And I said: All right, let's go do this.</p> <p>25</p>	<p style="text-align: right;">176</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. In your experience as an MMA promoter, was</p> <p>3 having access to, you know, cash alone as an MMA</p> <p>4 promoter sufficient to attract top talent?</p> <p>5 A. Is cash enough?</p> <p>6 Q. In and of itself.</p> <p>7 A. That's -- that's a very tricky question,</p> <p>8 and I'll tell you why. Because if I went to a</p> <p>9 fighter and I was trying to recruit a fighter and</p> <p>10 let's say UFC was coming in and we're making the same</p> <p>11 offer, right, they would have familiarity with both</p> <p>12 of us. But let's say, you know, somebody else came</p> <p>13 in and was willing to pay even more money.</p> <p>14 A lot of times, a fighter will take what</p> <p>15 they're familiar with, and it might be less money.</p> <p>16 So I don't think money is the only, you</p> <p>17 know, consideration because there has to be a comfort</p> <p>18 level for them to trust you and want to fight for</p> <p>19 you.</p> <p>20 Q. And do the fighters also need to know that</p> <p>21 they will have the opportunity to be matched against</p> <p>22 fighters of, you know, comparable quality?</p> <p>23 MS. GRIGSBY: Objection to form,</p> <p>24 foundation.</p> <p>25</p>
<p style="text-align: right;">175</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 BY MR. DELL'ANGELO:</p> <p>3 Q. Before June of 2014, did Bellator have a --</p> <p>4 you mentioned Viacom. Did Bellator have a</p> <p>5 relationship with Viacom?</p> <p>6 A. Before 2014?</p> <p>7 Q. June of 2014, yeah.</p> <p>8 A. That was coming out of -- yes, they did.</p> <p>9 Q. And did Bellator's pre-June 2014</p> <p>10 relationship with Viacom mean that Bellator had, you</p> <p>11 know, access to capital to pay fighters that, you</p> <p>12 know, had an upstart promotion might not otherwise</p> <p>13 have?</p> <p>14 MS. GRIGSBY: Objection to form.</p> <p>15 MR. KELLY: Objection, foundation, calls</p> <p>16 for speculation.</p> <p>17 THE WITNESS: Yeah, I would have to</p> <p>18 speculate at this point.</p> <p>19 BY MR. DELL'ANGELO:</p> <p>20 Q. Are you familiar with Dana White's</p> <p>21 statements about, you know, the importance of</p> <p>22 Bellator's relationship with Viacom as it relates to</p> <p>23 Bellator's access to what he has characterized as</p> <p>24 \$5 billion in cash? Have you heard those statements?</p> <p>25 A. No.</p>	<p style="text-align: right;">177</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 BY MR. DELL'ANGELO:</p> <p>3 Q. In your experience.</p> <p>4 A. I mean, I've never had a fighter that I've</p> <p>5 offered a contract to say, well, I want to fight this</p> <p>6 guy and then I want to do this and that. They want</p> <p>7 to know their deal, and then, they'll go deal with</p> <p>8 the division is my experience.</p> <p>9 Q. I guess thinking about it differently,</p> <p>10 let's take Fedor as an example since we talked about</p> <p>11 him.</p> <p>12 In your experience, would a fighter like</p> <p>13 Fedor, would it be beneficial to his career to join a</p> <p>14 promotion that only had unknown, untested fighters?</p> <p>15 MS. GRIGSBY: Objection, calls for</p> <p>16 speculation.</p> <p>17 THE WITNESS: My opinion is that he</p> <p>18 would -- he would take that into consideration, yes.</p> <p>19 BY MR. DELL'ANGELO:</p> <p>20 Q. Do you know if he was ever presented with</p> <p>21 that kind of opportunity?</p> <p>22 A. I will say this, he did fight in Russia</p> <p>23 many times for small organizations that he felt that</p> <p>24 he wanted to fight in Russia. So he fought for these</p> <p>25 companies and they paid him, and he fought several</p>

<p style="text-align: right;">178</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 times there that were not big, big, you know,</p> <p>3 worldwide companies.</p> <p>4 Q. So let's get back to sort of Bellator</p> <p>5 post -- let's get back to Bellator post June 2014.</p> <p>6 Or get to it, as the case may be.</p> <p>7 Does Bellator have a policy regarding its</p> <p>8 fighters' ability to sign sponsorship deals with</p> <p>9 Bellator sponsors?</p> <p>10 MS. GRIGSBY: Objection, form.</p> <p>11 THE WITNESS: Yes, it has a policy, yes.</p> <p>12 BY MR. DELL'ANGELO:</p> <p>13 Q. Does that policy include a sponsorship tax</p> <p>14 like the one that you testified about at the UFC?</p> <p>15 MS. GRIGSBY: Objection, form.</p> <p>16 THE WITNESS: No.</p> <p>17 BY MR. DELL'ANGELO:</p> <p>18 Q. And does Bellator have a policy that</p> <p>19 governs its fighters' ability to sign with sponsors</p> <p>20 that are not Bellator sponsors?</p> <p>21 A. Yes.</p> <p>22 Q. And what is that policy?</p> <p>23 A. I'll just explain the policy.</p> <p>24 Q. Sure.</p> <p>25 A. The basic policy is simple. You can't have</p>	<p style="text-align: right;">180</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. Okay. So what is your understanding of</p> <p>3 what it is?</p> <p>4 A. My understanding is when another league,</p> <p>5 like, say, for instance Rizin or KSW wants to</p> <p>6 co-promote, then it becomes a co-promotion between</p> <p>7 Bellator and Rizin or Bellator and, you know, KSW or</p> <p>8 One FC. That's what I think of as a co-pro.</p> <p>9 Q. Does Bellator have a policy regarding</p> <p>10 co-promotion as you think of it?</p> <p>11 A. No.</p> <p>12 Q. So it doesn't prohibit co-promotion, right?</p> <p>13 A. No.</p> <p>14 Q. Does Bellator have a policy with respect to</p> <p>15 whether or not a fighter under contract with Bellator</p> <p>16 can fight for other promotions? Other MMA</p> <p>17 promotions, that is.</p> <p>18 A. Repeat that one more time just to make sure</p> <p>19 I understand.</p> <p>20 Q. Yes. Does Bellator have a policy regarding</p> <p>21 whether or not fighters under contract with Bellator</p> <p>22 may fight for other MMA promotions?</p> <p>23 A. Yes.</p> <p>24 Q. And what is that policy?</p> <p>25 A. Under the contract, it's an exclusive</p>
<p style="text-align: right;">179</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 a competing sponsor on a fighter that competes</p> <p>3 against your league, you know, league sponsors.</p> <p>4 So we have like Dave & Busters, our</p> <p>5 fighters can't go get Buffalo Wild Wings, let's say,</p> <p>6 kind of the same area. Or if he has Bud Light and</p> <p>7 ours is Miller, then there's a conflict. So they</p> <p>8 can't do that.</p> <p>9 Other than that, they're free to go as long</p> <p>10 as it falls under the rules and the regulations of</p> <p>11 Viacom Media Company.</p> <p>12 Q. Otherwise, they're not -- aside from those</p> <p>13 limitations, Bellator doesn't restrict its fighters'</p> <p>14 right to have sponsors when they're fighting for</p> <p>15 Bellator?</p> <p>16 A. Other than that, there's no other</p> <p>17 restrictions.</p> <p>18 Q. And does Bellator have a policy regarding</p> <p>19 co-promotion for its fighters?</p> <p>20 A. Can you explain that?</p> <p>21 Q. Sure. Are you familiar with the term</p> <p>22 "co-promotion" as it relates to the promotion of MMA</p> <p>23 bouts?</p> <p>24 A. It could mean -- it could mean several</p> <p>25 things.</p>	<p style="text-align: right;">181</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 contract with the fight company. So they are not</p> <p>3 allowed to compete.</p> <p>4 Q. And do you know when that policy came into</p> <p>5 being?</p> <p>6 MS. GRIGSBY: Objection, foundation.</p> <p>7 THE WITNESS: I don't. And I will say</p> <p>8 this. If we have a fighter that wants to fight in</p> <p>9 Japan, then we'll send him. If we have a fighter</p> <p>10 that wants to fight in another league, we'll send</p> <p>11 them. We send fighters to Vienna sometimes.</p> <p>12 I do believe, and again, I'm not a hundred</p> <p>13 percent, but my belief is that we do have in some</p> <p>14 fighters' contracts that they actually are allowed to</p> <p>15 compete in a fight league in another country if we're</p> <p>16 not -- if it doesn't hurt our business in the sense</p> <p>17 that we have certain obligations to these athletes,</p> <p>18 they have to fight two or three times a year. And we</p> <p>19 want to make sure that we're able to make that happen</p> <p>20 for the athlete. Otherwise, you know, we could be in</p> <p>21 breach of the deal.</p> <p>22 So that's kind of in a nutshell what that</p> <p>23 agreement is.</p> <p>24 BY MR. DELL'ANGELO:</p> <p>25 Q. Right. So for example, you might not agree</p>

<p style="text-align: right;">262</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 contenders in UFC after Strikeforce.</p> <p>3 Do you remember that?</p> <p>4 A. Yes.</p> <p>5 Q. And I don't think I can go through the</p> <p>6 entire list, but examples were Antonio Silva; is that</p> <p>7 right?</p> <p>8 A. He was one.</p> <p>9 Q. Gilbert Melendez?</p> <p>10 A. Yes.</p> <p>11 Q. Alistair Overeem?</p> <p>12 A. Yes.</p> <p>13 Q. Ronda Rousey?</p> <p>14 A. Yes.</p> <p>15 Q. Luke Rockhold?</p> <p>16 A. Yes.</p> <p>17 Q. And there are others?</p> <p>18 A. Yes.</p> <p>19 Q. So do you know if like, for example,</p> <p>20 Antonio Silva got paid less at the UFC than he did at</p> <p>21 Strikeforce?</p> <p>22 A. I don't know.</p> <p>23 Q. Do you know if Gilbert Melendez got paid</p> <p>24 less at the UFC than he did at Strikeforce?</p> <p>25 A. I'm not sure.</p>	<p style="text-align: right;">264</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 contract, an agreement with a venue?</p> <p>3 A. Yes.</p> <p>4 Q. On behalf of Bellator?</p> <p>5 A. I can explain the process.</p> <p>6 Q. Sure.</p> <p>7 A. The process is, basically, we have a venue</p> <p>8 staff member that goes out and find the venues, and</p> <p>9 they negotiate the deal.</p> <p>10 I say green light it. Then it goes to</p> <p>11 legal, and that's how it works.</p> <p>12 Q. But as president of Bellator, sometimes it</p> <p>13 is your responsibility to sign the venue agreements;</p> <p>14 is that right?</p> <p>15 A. Oh, yeah. I'm not saying not sign. But as</p> <p>16 far as, you know, look through every agreement and</p> <p>17 negotiate the nuances of the deal, that's where our</p> <p>18 legal team steps in.</p> <p>19 (Exhibit 27 was marked for</p> <p>20 identification by the reporter.)</p> <p>21 BY MS. GRIGSBY:</p> <p>22 Q. So I'm showing you what has been marked as</p> <p>23 Exhibit 27.</p> <p>24 Exhibit 27 has been Bates-stamped</p> <p>25 SBPCL00000225 with the last number that should be</p>
<p style="text-align: right;">263</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Q. Do you know if Alistair Overeem got paid</p> <p>3 less than he did at Strikeforce in the UFC?</p> <p>4 A. I'm not sure.</p> <p>5 Q. Do you know if Ronda Rousey got paid less</p> <p>6 at the UFC than she did in Strikeforce?</p> <p>7 A. I'm sure she got more, but I'm not familiar</p> <p>8 with these contracts.</p> <p>9 Q. So is it your understanding, then, that</p> <p>10 some of the fighters who came from Strikeforce and</p> <p>11 went to the UFC, at least some of them actually ended</p> <p>12 up getting paid more at the UFC; is that right?</p> <p>13 A. Yes.</p> <p>14 MR. DELL'ANGELO: Objection to form.</p> <p>15 BY MS. GRIGSBY:</p> <p>16 Q. Now, just moving on through your career now</p> <p>17 as president of Bellator, are you familiar with</p> <p>18 Bellator's venue contracts, its contracts with</p> <p>19 different venues?</p> <p>20 A. Can you be more specific.</p> <p>21 Q. So for example, when, you know, Bellator</p> <p>22 makes a contract, have an event at SAP, do you see</p> <p>23 those contracts?</p> <p>24 A. I do not see the contracts.</p> <p>25 Q. Do you know -- well, have you ever signed a</p>	<p style="text-align: right;">265</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 SBPCL00000247.</p> <p>3 MR. KELLY: Is there a question on that?</p> <p>4 MS. GRIGSBY: Yes, I do have a question. I</p> <p>5 just wanted to let him look through.</p> <p>6 MR. KELLY: Oh, okay. Sorry.</p> <p>7 MS. GRIGSBY: You know --</p> <p>8 MR. KELLY: I didn't know if you --</p> <p>9 MS. GRIGSBY: If you want me to move it, I</p> <p>10 can move it --</p> <p>11 MR. DELL'ANGELO: -- were waiting for an</p> <p>12 answer.</p> <p>13 MS. GRIGSBY: -- you know. I just didn't</p> <p>14 want to jump in there before you had time to read the</p> <p>15 exhibit.</p> <p>16 BY MS. GRIGSBY:</p> <p>17 Q. Let's look at paragraph 15, which is on</p> <p>18 SBPCL00000230.</p> <p>19 Now, paragraph 15 reads:</p> <p>20 "Exclusivity. Licensor</p> <p>21 understands and agrees that during</p> <p>22 the 90-day period of time prior to</p> <p>23 the event and for the period of time</p> <p>24 extending to 45 days after the</p> <p>25 event, it shall not host any other</p>

<p style="text-align: right;">266</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 combat event aside from the event</p> <p>3 set forth herein."</p> <p>4 Let me just back up. Do you recognize this</p> <p>5 document?</p> <p>6 A. No.</p> <p>7 Q. So on the last page, or the page that ends</p> <p>8 with 234.</p> <p>9 A. My signature.</p> <p>10 Q. So that's your signature. So you were the</p> <p>11 signatory for this contract; is that right, on behalf</p> <p>12 of Bellator?</p> <p>13 A. Yes. I mean, we do have my signature stamp</p> <p>14 on some of these documents, you know, that they're</p> <p>15 authorized -- our legal team is authorized to sign it</p> <p>16 on behalf of myself.</p> <p>17 Q. So you don't remember entering into this</p> <p>18 contract; is that right?</p> <p>19 A. I can tell you, I've never read any venue</p> <p>20 document probably ever in the history of my combat</p> <p>21 sports promoting business.</p> <p>22 Q. Well, would it surprise you if venue</p> <p>23 contracts have a provision, such as this one, where</p> <p>24 it is exclusive and it cannot host other combat</p> <p>25 sports during a certain window?</p>	<p style="text-align: right;">268</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 reference to our Thackerville, Oklahoma event. And</p> <p>3 we go there, I think two or three times a year. And</p> <p>4 I think it came up for renewal in '16, and this looks</p> <p>5 like the extension.</p> <p>6 But again, the process would be, you know,</p> <p>7 our venue staff member talking to the casino and the</p> <p>8 host venue, and then, basically, I would green light</p> <p>9 the terms and the conditions that they're proposing</p> <p>10 or make changes. And then, it just goes to legal,</p> <p>11 and that's how it operates.</p> <p>12 Q. Well, looking at SBPCL00000332, which is</p> <p>13 under heading 3, subparagraph Q, it says:</p> <p>14 "Exclusivity. Nation understands</p> <p>15 and agrees that during the term, it</p> <p>16 shall not host any other MMA events</p> <p>17 aside from the event set forth</p> <p>18 herein."</p> <p>19 Is this the type of term that you would</p> <p>20 approve?</p> <p>21 A. I didn't even know that was in the</p> <p>22 agreement.</p> <p>23 Q. Now, would you say that Bellator is a</p> <p>24 national promotion of MMA bouts events?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">267</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 MR. DELL'ANGELO: Objection to form.</p> <p>3 THE WITNESS: You know, I'm just not sure.</p> <p>4 BY MS. GRIGSBY:</p> <p>5 Q. We'll put that one to the side.</p> <p>6 (Exhibit 28 was marked for</p> <p>7 identification by the reporter.)</p> <p>8 BY MS. GRIGSBY:</p> <p>9 Q. And I'm going to hand you what has been</p> <p>10 marked as Exhibit 28, and you might have similar</p> <p>11 answers, but we'll see.</p> <p>12 A. I'll try my best.</p> <p>13 Q. So Exhibit 28 has been Bates-stamped</p> <p>14 SBPCL00000324 with the ending Bates stamp of</p> <p>15 SBPCL00000341.</p> <p>16 Just turning to the last page.</p> <p>17 A. Yes.</p> <p>18 Q. Is that your signature on the last page?</p> <p>19 A. Yes.</p> <p>20 Q. Do you recognize this document?</p> <p>21 A. No.</p> <p>22 Q. Do you recall entering into a site</p> <p>23 agreement with the Chickasaw Nation at all, between</p> <p>24 Bellator and the Chickasaw Nation?</p> <p>25 A. Yes. I believe this document is in</p>	<p style="text-align: right;">269</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 (Exhibit 29 was marked for</p> <p>3 identification by the reporter.)</p> <p>4 BY MS. GRIGSBY:</p> <p>5 Q. I'm handing you what has been marked as</p> <p>6 Exhibit 29.</p> <p>7 Now, this is an article from SB Nation,</p> <p>8 which is "Spike TV president: Bellator MMA on an</p> <p>9 even footing with the UFC." MMA fighting is the</p> <p>10 category. It's by Mark Raimondi, dated February 8th,</p> <p>11 2015.</p> <p>12 Now, I just want to direct your attention</p> <p>13 to the last page. On the last page, you're quoted as</p> <p>14 saying:</p> <p>15 "There's not going to be a fighter</p> <p>16 on the planet. We can't afford and</p> <p>17 have access to."</p> <p>18 Do you see that?</p> <p>19 A. Yes, I see it.</p> <p>20 Q. Did you make that statement?</p> <p>21 A. Yes.</p> <p>22 Q. And do you believe it's true that there's</p> <p>23 not going to be a fighter on the planet that Bellator</p> <p>24 can't afford and have access to?</p> <p>25 MR. DELL'ANGELO: Objection to form.</p>

68 (Pages 266 to 269)

<p style="text-align: right;">270</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 THE WITNESS: Let me just explain the</p> <p>3 steps.</p> <p>4 So basically, it's -- access to, meaning if</p> <p>5 they're a free agent, obviously, we have to -- we</p> <p>6 can't just go steal fighters. So that's maybe a</p> <p>7 misstep on my part.</p> <p>8 But I believe that we will be able to</p> <p>9 afford the fighters that are getting the top dollar</p> <p>10 out there.</p> <p>11 BY MS. GRIGSBY:</p> <p>12 Q. So with that correction, which is there's</p> <p>13 not going to be a free agent fighter on the planet</p> <p>14 that we can't afford and have access to, would you</p> <p>15 say it's true that there's not going to be a free</p> <p>16 agent fighter that Bellator can't afford or have</p> <p>17 access to?</p> <p>18 MR. DELL'ANGELO: Objection to form.</p> <p>19 THE WITNESS: I believe it's true.</p> <p>20 (Exhibit 30 was marked for</p> <p>21 identification by the reporter.)</p> <p>22 BY MS. GRIGSBY:</p> <p>23 Q. I'm handing you what has been marked as</p> <p>24 Exhibit 32 --</p> <p>25 THE REPORTER: Exhibit what?</p>	<p style="text-align: right;">272</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 BY MS. GRIGSBY:</p> <p>3 Q. So this article is dated December 21st,</p> <p>4 2015.</p> <p>5 So as of December 2015, do you believe that</p> <p>6 Bellator has or had some of the best featherweight</p> <p>7 fighters fighting for Bellator in the world?</p> <p>8 A. Yes.</p> <p>9 Q. You can put that to the side.</p> <p>10 (Exhibit 31 was marked for</p> <p>11 identification by the reporter.)</p> <p>12 BY MS. GRIGSBY:</p> <p>13 Q. So I'm handing you what has been marked as</p> <p>14 Exhibit 31, which is an article, again, from</p> <p>15 SB Nation, which reads, "Scott Coker: Bellator did</p> <p>16 talk to Alistair Overeem's reps, but 'we chose' not</p> <p>17 to make an offer." It's dated February 16th, 2016.</p> <p>18 Now, I just want to direct your attention</p> <p>19 to the third page in this article. In the third</p> <p>20 paragraph up from the bottom, which starts as --</p> <p>21 through to the last one in the article. The third</p> <p>22 paragraph up from the bottom. It starts with, "And</p> <p>23 same thing with Sterling."</p> <p>24 Now, the last sentence in this box says:</p> <p>25 "There are other free agents that</p>
<p style="text-align: right;">271</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 MS. GRIGSBY: 32. Oh, sorry. 30.</p> <p>3 Exhibit 30.</p> <p>4 BY MS. GRIGSBY:</p> <p>5 Q. Exhibit 30 is another article from</p> <p>6 SB Nation called "AJ McKee re-ups for multiple years.</p> <p>7 Will remain in Bellator MMA for foreseeable future."</p> <p>8 Now, I just want to direct your attention</p> <p>9 to the second page where the article starts. The</p> <p>10 last paragraph at the bottom. The beginning of the</p> <p>11 sentence reads:</p> <p>12 "We have many of the best</p> <p>13 featherweights in the world fighting</p> <p>14 for Bellator, and AJ has left no</p> <p>15 doubt in my mind that he belongs in</p> <p>16 that group."</p> <p>17 Did you make that statement?</p> <p>18 A. Yes.</p> <p>19 Q. And do you believe it to be true?</p> <p>20 A. Yes.</p> <p>21 Q. So you believe that Bellator has some of</p> <p>22 the best featherweight fighters in the world, is that</p> <p>23 right, fighting for Bellator?</p> <p>24 MR. DELL'ANGELO: Sorry. I'm going to just</p> <p>25 object to the form. Vague and ambiguous as to time.</p>	<p style="text-align: right;">273</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 are on the market that we're going</p> <p>3 after. There's a lot of fighters</p> <p>4 out there right now."</p> <p>5 A. Um-hmm.</p> <p>6 Q. Did you make that statement in 2016?</p> <p>7 A. Yes.</p> <p>8 Q. And do you believe it to be true, that in</p> <p>9 February 2016, there were a lot of fighters out there</p> <p>10 on the market that Bellator could go after?</p> <p>11 A. Yes.</p> <p>12 Q. You can put that to the side.</p> <p>13 (Exhibit 32 was marked for</p> <p>14 identification by the reporter.)</p> <p>15 BY MS. GRIGSBY:</p> <p>16 Q. I'm handing you what has been marked as</p> <p>17 Exhibit 32.</p> <p>18 Exhibit 32 is an L.A. Times article</p> <p>19 entitled "Bellator goes after free agents as it digs</p> <p>20 in as alternative to UFC," dated January 21st, 2017,</p> <p>21 by Lance Pugmire.</p> <p>22 Now, in the article, in the third paragraph</p> <p>23 of the second page, there's a quote from you that</p> <p>24 says:</p> <p>25 "We picked up a hundred percent of</p>

<p style="text-align: right;">274</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 the guys we went after last year.</p> <p>3 It's a commitment by Spike TV and</p> <p>4 Viacom."</p> <p>5 Do you see that?</p> <p>6 A. Yes.</p> <p>7 Q. Did you make that statement?</p> <p>8 A. Yes.</p> <p>9 Q. And is it true that in last year, meaning</p> <p>10 that as of January 2017, Bellator picked up a hundred</p> <p>11 percent of the free agent MMA fighters that it went</p> <p>12 after?</p> <p>13 A. Yes.</p> <p>14 (Exhibit 33 was marked for</p> <p>15 identification by the reporter.)</p> <p>16 BY MS. GRIGSBY:</p> <p>17 Q. I'm handing you what has been marked as</p> <p>18 Exhibit 33.</p> <p>19 Now, since you've been president of</p> <p>20 Bellator, have you followed the ratings that</p> <p>21 Bellator's events have gotten either on free TV or on</p> <p>22 pay-per-view?</p> <p>23 A. Yes.</p> <p>24 Q. Now, this article is another SB Nation</p> <p>25 Bloody Elbow article entitled "Kimbo versus Shamrock</p>	<p style="text-align: right;">276</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Do you recognize this document?</p> <p>3 A. It looks like a document that traditionally</p> <p>4 comes to us, including myself from after an event,</p> <p>5 from the press guys at Spike TV, David Schwarz.</p> <p>6 Q. Now, on the second page, do you see the</p> <p>7 quote:</p> <p>8 "Bellator produced an entertaining</p> <p>9 night of fights that certainly</p> <p>10 brought with it more headlines and</p> <p>11 media attention than its main</p> <p>12 competitor, the UFC," by SB Nations.</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. And that is referring to -- all these</p> <p>16 quotes are referring to the Shamrock/Kimbo Slice</p> <p>17 fight; is that correct?</p> <p>18 A. Yes.</p> <p>19 Q. And do you agree with SB Nation that</p> <p>20 Bellator produced an entertaining night of fights</p> <p>21 that brought with it more headlines and media</p> <p>22 attention than its main competitor, the UFC, for the</p> <p>23 Shamrock/Slice fight?</p> <p>24 A. I believe for that event, we did.</p> <p>25 ///</p>
<p style="text-align: right;">275</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 Bellator MMA (main event) averages 2.1 million</p> <p>3 viewers on Spike," dated June 22nd, 2015.</p> <p>4 Now, is it true that in June of 2015,</p> <p>5 Bellator's Kimbo Slice/Shamrock event topped</p> <p>6 2.1 million viewers on Spike?</p> <p>7 A. Yes.</p> <p>8 Q. And in your view, is that a sizeable</p> <p>9 audience, 2.1 million viewers, for an MMA event?</p> <p>10 A. Yes.</p> <p>11 MR. DELL'ANGELO: Objection to the form.</p> <p>12 THE WITNESS: Sorry.</p> <p>13 (Exhibit 34 was marked for</p> <p>14 identification by the reporter.)</p> <p>15 BY MS. GRIGSBY:</p> <p>16 Q. So let's look at -- this is Exhibit 34.</p> <p>17 Exhibit 34 is another production from Shark</p> <p>18 Entertainment. The first email is really a long</p> <p>19 forward, but it's from David I. Schwarz at Spike TV,</p> <p>20 subject: Spike press June 22nd, 2015, Bellator 138,</p> <p>21 and then, it looks like there's a forward from Scott</p> <p>22 Coker at Bellator on the same date, and finally, from</p> <p>23 Christian Printup to you, Scott Coker, with a cc to a</p> <p>24 number of individuals on June 22nd, 2015. Oh,</p> <p>25 Christian Printup.</p>	<p style="text-align: right;">277</p> <p>1 SCOTT COKER - HIGHLY CONFIDENTIAL</p> <p>2 (Exhibit 35 was marked for</p> <p>3 identification by the reporter.)</p> <p>4 BY MS. GRIGSBY:</p> <p>5 Q. I'm showing you what has been marked as</p> <p>6 Exhibit 35, which is an SB Nation article, dated</p> <p>7 November 10, 2015 with a headline "Bellator slightly</p> <p>8 tops UFC in total viewers over the weekend."</p> <p>9 Now, do you remember the event discussed in</p> <p>10 this article, which is Bellator St. Louis event in</p> <p>11 November of 2015?</p> <p>12 A. Yes.</p> <p>13 Q. And do you agree that the St. Louis event</p> <p>14 got better ratings than the UFC by drawing 814,000</p> <p>15 viewers?</p> <p>16 A. Yes.</p> <p>17 Q. So during your time there, there have been</p> <p>18 a number of times where Bellator's ratings have</p> <p>19 either met or exceeded that of the UFC event during</p> <p>20 the same time period; is that right?</p> <p>21 A. Yes.</p> <p>22 Q. And just to be clear, so during your time</p> <p>23 at Bellator, there are a number of times when</p> <p>24 Bellator's ratings have been the same or exceeded the</p> <p>25 UFC? I was just clarifying the question.</p>

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<p>1</p> <p>2 STATE OF _____)</p> <p>3) :ss</p> <p>4 COUNTY OF _____)</p> <p>5</p> <p>6</p> <p>7 I, SCOTT COKER, the witness</p> <p>8 herein, having read the foregoing</p> <p>9 testimony of the pages of this deposition,</p> <p>10 do hereby certify it to be a true and</p> <p>11 correct transcript, subject to the</p> <p>12 corrections, if any, shown on the attached</p> <p>13 page.</p> <p>14</p> <p>15 _____</p> <p>16 SCOTT COKER</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Sworn and subscribed to before</p> <p>21 me, this _____ day of</p> <p>22 _____, 2017.</p> <p>23</p> <p>24 _____</p> <p>25 Notary Public</p>	<p>1 INSTRUCTIONS TO WITNESS</p> <p>2</p> <p>3 Please read your deposition over carefully</p> <p>4 and make any necessary corrections. You should state</p> <p>5 the reason in the appropriate space on the errata</p> <p>6 sheet for any corrections that are made.</p> <p>7 After doing so, please sign the errata sheet</p> <p>8 and date it.</p> <p>9 You are signing same subject to the changes</p> <p>10 you have noted on the errata sheet, which will be</p> <p>11 attached to your deposition.</p> <p>12 It is imperative that you return the original</p> <p>13 errata sheet to the deposing attorney within thirty</p> <p>14 (30) days of receipt of the deposition transcript by</p> <p>15 you. If you fail to do so, the deposition transcript</p> <p>16 may be deemed to be accurate and may be used in court.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1</p> <p>2 CERTIFICATE OF REPORTER</p> <p>3 I, Cynthia K. DuRivage, a Certified</p> <p>4 Shorthand Reporter of the State of Nevada, do hereby</p> <p>5 certify:</p> <p>6 That the foregoing proceedings were taken</p> <p>7 before me at the time and place herein set forth;</p> <p>8 that any witnesses in the foregoing proceedings,</p> <p>9 prior to testifying, were duly sworn; that a record</p> <p>10 of the proceedings was made by me using machine</p> <p>11 shorthand which was thereafter transcribed under my</p> <p>12 direction; that the foregoing transcript is a true</p> <p>13 record of the testimony given.</p> <p>14 I further certify I am neither financially</p> <p>15 interested in the action nor a relative or employee</p> <p>16 of any attorney or party to this action.</p> <p>17 Reading and signing by the witness was</p> <p>18 requested.</p> <p>19 IN WITNESS WHEREOF, I have this date</p> <p>20 subscribed my name.</p> <p>21 Dated: August 16, 2017</p> <p>22</p> <p>23</p> <p>24 _____</p> <p>25 CYNTHIA K. DuRIVAGE CCR No. 451</p>	<p>1 E R R A T A</p> <p>2</p> <p>3</p> <p>4</p> <p>5 I wish to make the following changes,</p> <p>6 for the following reasons:</p> <p>7</p> <p>8 PAGE LINE</p> <p>9 _____ CHANGE: _____</p> <p>10 REASON: _____</p> <p>11 _____ CHANGE: _____</p> <p>12 REASON: _____</p> <p>13 _____ CHANGE: _____</p> <p>14 REASON: _____</p> <p>15 _____ CHANGE: _____</p> <p>16 REASON: _____</p> <p>17 _____ CHANGE: _____</p> <p>18 REASON: _____</p> <p>19 _____ CHANGE: _____</p> <p>20 REASON: _____</p> <p>21</p> <p>22</p> <p>23 _____ WITNESS' SIGNATURE _____ DATE</p> <p>24</p> <p>25</p>